

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHRISTMAS TREE SHOPS, LLC, *et al.*,¹

Debtors.

Chapter 7

Case No. 23-10576 (TMH)

(Jointly Administered)

GEORGE L. MILLER, in his capacity as Chapter 7 Trustee of CHRISTMAS TREE SHOPS, LLC *et al.*,

Plaintiff,

vs.

WINBROOK COMMUNICATIONS SERVICES, INC.,

Defendant.

Adv. Proc. No. 25-50886 (TMH)

STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO ANSWER THE COMPLAINT

Plaintiff, George L. Miller in his capacity as chapter 7 trustee of Christmas Tree Shops, LLC, *et al.*, (the “Plaintiff”), for the estates of the above-captioned debtors (the “Debtors”) in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the “Bankruptcy Code”), by and through his undersigned counsel and defendant Winbrook Communications Services, Inc., (the “Defendant,” and together with Plaintiff, the “Parties”), enter into this *Stipulation for Extension of Time for Defendant to Answer the Complaint* (the “Stipulation”) and hereby stipulate and agree as follows:

¹ The Debtors in these chapter 7 cases and the last four digits of each Debtor’s U.S. tax identification number are as follows: Christmas Tree Shops, LLC (1207), Handil, LLC (1150), Handil Holdings, LLC (2891), Salkovitz Family Trust 2, LLC (8773), and Nantucket Distributing Co., LLC (1640).

1. The Parties agree and stipulate that the time within which the Defendant may answer the *First Amended Complaint* [D.I. 3] in the above-captioned adversary proceeding is hereby extended to and including July 19, 2025.

2. Except as specifically set forth herein, the Parties reserve all of their respective rights in this matter.

Dated: June 17, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Bradford J. Sandler (DE Bar No. 4142)
Peter J. Keane (DE Bar No. 5503)
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*Counsel to Plaintiff George L. Miller, Chapter 7
Trustee of Christmas Tree Shops, LLC, et al.*

Dated: June 17, 2025

RUBERTO, ISRAEL & WEINER

/s/ John E. Murray

John E. Murray
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*Counsel to Defendant
Winbrook Communications Services, Inc.*

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Plaintiff,

vs.

WINBROOK COMMUNICATIONS SERVICES, INC.,

Defendant.

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CERTIFICATE OF SERVICE

I, Peter J. Keane, hereby certify that on the 17th day of June, 2025, I caused a copy of the following document(s) to be served on the individual(s) on the attached service list(s) in the manner indicated:

STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO ANSWER THE COMPLAINT

/s/ Peter J. Keane

Peter J. Keane (DE Bar No. 5503)

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CHRISTMAS TREE SHOPS, LLC –
Service List
re WINBROOK COMMUNICATIONS SERVICES, INC.
Adv. Pro. No. 25-50886 (TMH)
01 – Email

Email
(Counsel Winbrook Communications Services, Inc.)

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*Counsel to Defendant
Winbrook Communications Services, Inc.*